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Council of the Great City Schools®

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March 11, 2019

The Honorable Bobby Scott and the Honorable Virginia Foxx
Education and Labor Committee
U.S. House of Representatives
Washington D.C. 20515

Dear Chairman Scott and Dr. Foxx:

The Council of the Great City Schools, the coalition of the nation's largest central city school districts, writes to underscore our support for the regulatory flexibility provided in the December 12, 2018 school meal regulations – which reflect our earlier rulemaking comments. Further, the Council continues to believe that additional flexibilities and revisions to the original January 2012 regulations for the Healthy and Hunger-Free Kids Act (HHFKA) can be achieved without undermining current nutrient and dietary requirements for school meal programs. The HHFKA regulations have added over \$1 billion in annual unreimbursed costs to school meal programs and have complicated the ability of school nutritionists and food service staff to provide attractive food options for students.

To be clear, the Council has been on record as strongly opposing the sale of junk food in our schools and supporting the current nutrient and dietary requirements for school meals -- except for the widely-criticized and congressionally-suspended sodium requirements. Nonetheless, the Council also has long-contended that the Agriculture Department's (USDA) meal pattern regulations represent unnecessary federal micromanagement of school meal programs. Instead of maintaining an appropriate focus on the essential nutrition and dietary requirements for school meals, these extensive regulations dictate the types of food items that public schools are required to serve over the course of each week – including federal requirements on the type, volume, frequency, form, and even the color of food items served in our school cafeterias. Further flexibility in school meal regulations would allow schools to take better advantage of in-season fruits and vegetables, design more desirable meals, reduce plate waste, increase student participation, accommodate culturally-related foods, and control costs.

The Council and our food service directors continue to work with USDA to improve and streamline school meal program regulations in order to provide healthy and attractive school-based meals for our primarily low-income student population.

Sincerely,

Jeffrey A. Simering
Director of Legislative Services
Council of the Great City Schools